# Resolution Process – Documentation Review and Initial Determination

- Regional Office and ARU reviews the grantee documentation and gives their recommendation to the ARU Grant Officer
- An Initial Determination is issued
- Initial Determination summarizes which findings are considered corrected or uncorrected and which costs allowed or tentatively disallowed
- Informal Resolution begins and lasts 60 days from issuance of the Initial Determination



# Resolution Process – Grantees Response to ID and Preparing for FD

- Again, the grantee has the opportunity to submit documentation
- ► ARU and Regional Office reviews the documentation and makes recommendation to the Grant Officer



# The Final Determination (FD)

- Copies of FD transmitted to recipient, OIG, Region and the Grant Officer
- ► FD summarizes which findings are determined to be corrected or uncorrected by the Grant Officer, as well as any disallowed costs



## FD – Time Requirement

- ▶ At DOL, Final Determination must be issued by ETA within six months (180 days) of receipt from OIG
  -No extensions
- ▶ DOL UG Exception (2 CFR 2900.21)
- ▶ Uniform Guidance (2 CFR 200.521)
- Department of Labor Manual Series (DLMS) 8



## After the Final Determination

- Regional follow up on uncorrected findings in the FD
- Regional TA to help resolve uncorrected findings
- Disallowed costs are sent to ETA Accounting for possible debt collection



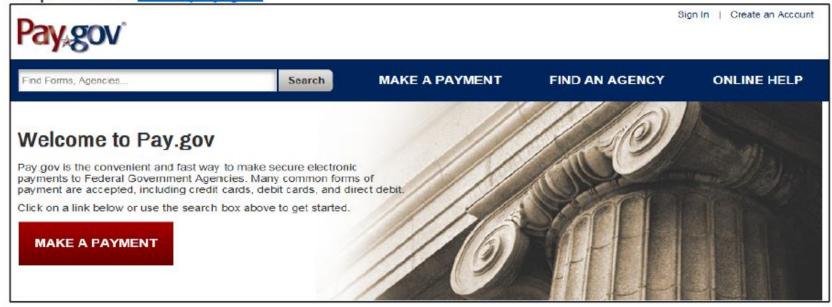
### Federal Debt Collection

- ▶ 2 CFR 200.345
- ► Federal debt collection provisions
- Debt established in Final Determination payable in 30 days
- ▶ If not paid within 90 days Federal awarding agency may reduce the debt by:
  - -Withholding advance payments or
  - -Taking other action permitted by Federal statute
- Note that interest charged on overdue debt



# Pay.gov

#### Step 1: Go to www.pay.gov





## Appeals

- Due within 21 days from the Receipt of the FD
  -Important to submit appeal timely
- Appeal rights and process described to grantee in FD cover letter
- Appeal to DOL Office of Administrative Law Judges
  -29 CFR 2900.22(b)



# Tips for Resolving Audit Findings and Resolving Quicker

- Grantees get a head start don't wait
- Communicate
- Ask for technical assistance when needed
- Be specific in your responses and provide supporting documentation
- Seek to resolve past and current audit findings



### Additional Resources

- Core Monitoring Guide
  - ▶ Objective 3.f Audits and Audit Resolution
- ▶ Grant & Financial Management Technical Assistance Guide
  - ► Chapter 16: Audit and Audit Resolution
- Department of Labor Exceptions 2 CFR Part 2900
  - ▶ 2 CFR 2900.2
  - ▶ 2 CFR 2900.20
  - ▶ 2 CFR 2900.21
  - ▶ 2 CFR 2900.22
- WIOA Provisions 20 CFR Part 683
  - ▶ 20 CFR 683.420
  - ▶ 20 CFR 683.730-750

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards <u>2 CFR Part 200</u>
  - ▶ 2 CFR 200.317-326
  - ▶ 2 CFR 200.331
  - ▶ 2 CFR 200.345
  - ▶ 2 CFR 200.501
  - ▶ 2 CFR 200.502
  - ▶ 2 CFR 200.504
  - ▶ 2 CFR 200.507
  - ▶ 2 CFR 200.509
  - ▶ 2 CFR 200.512
  - ▶ 2 CFR 200.514
  - ▶ 2 CFR 200.515
  - ▶ 2 CFR 200.521



## Additional Guidance on Audit Procurement

"How to Avoid a Substandard Audit: Suggestions for Procuring an Audit," located on the GAO website:

https://www.gao.gov/assets/200/194429.pdf.

Additional information can be found at:

- https://harvester.census.gov/facweb/
- www.agacgfm.org/homepage.aspx.



## Questions?

- ► Your Federal Project Officer (FPO)
- ► Kevin Brumback, <u>Brumback.Kevin@dol.gov</u>

